

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WAYNE BALIGA, derivatively on behalf
of LINK MOTION INC. (F/K/A NQ
MOBILE INC.),

Plaintiff,

-against-

LINK MOTION INC. (F/K/A NQ MOBILE
INC.), VINCENT WENYONG SHI, HIA
LIAN, XIAO YU,

Defendants,

-and-

LINK MOTION INC. (F/K/A NQ MOBILE
INC.),

Nominal Defendant.

Civil Action No. 1:18-cv-11642-VM-DCF

STIPULATION AND [proposed] SCHEDULING ORDER

WHEREAS, on October 14, 2020, defendant Shi filed a motion to direct indemnification (Dkt. 169);

WHEREAS, on October 23, 2020, the Court entered an Order approving the parties' agreement, including that Shi's motion for indemnification shall be deemed withdrawn without prejudice (Dkt. 175);

WHEREAS, on November 4, 2020, defendants Link Motion and Shi filed a motion to dismiss the Second Amended Complaint (Dkt. 177);

WHEREAS, on November 4, 2020, defendant Shi filed a motion to discharge the Receiver and vacate the preliminary injunction (Dkt. 180);

WHEREAS, on November 13, 2020, the Receiver filed an application for leave to call an extraordinary general meeting for Link Motion (Dkt. 188);

WHEREAS, on November 16, 2020, this Court directed the parties to submit a briefing schedule with respect to the above-referenced motions;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties as follows:

1. Any answer, opposition, motion or other response to the above-referenced motions (Dkt. Nos. 177, 180, 188) shall be served on or before December 18, 2020; and
2. Any replies shall be served on or before January 18, 2021.

Dated: New York, New York
November 18, 2020

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Counsel for Receiver

SO ORDERED:

Honorable Debra Freeman
United States Magistrate Judge